

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

IN RE:	*	
DAVID BO HYEON LIM	*	Case No. 09-27116-DK
Debtor(s)	*	(Chapter 7)
*   *   *   *   *	*	*   *   *   *   *

**TRUSTEE'S OBJECTION TO DEBTOR'S EXEMPTION  
IN LAWSUIT PROCEEDS**

George W. Liebmann, Trustee of David Bo Hyeon Lim, pursuant to Fed. R. Bankr. P. 4003 and Local Bankruptcy Rule 4003-1, objects to the Debtor's exemption in lawsuit proceeds, and in support thereof says:

1. The Debtor commenced this case on September 11, 2009 by the filing of a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.

2. George W. Liebmann is the duly qualified, appointed and acting Trustee in this case. The meeting of creditors was held October 16, 2009 and this objection is timely.

3. The Debtor lists on his Schedule B and exempts on his Schedule C \$50,000.00 in a civil suit against STV Network, Inc. for breach of employment contract. The cited basis for the exemption is Md. Code Ann., Com. Law § 15-601.1 and Md. Code Ann., Cts. & Jud. Proc. Art. § 11-504(b)(3).

4. The Trustee objects to the claimed exemption of \$50,000 in lawsuit proceeds on the grounds that: a) such proceeds are not exempt under Courts article § 11-504(b)(3) as arising from death, bodily injury, sickness or accident; and b) the exemption from garnishment provided by Commercial Law article § 15-601.1 does not provide an exemption for economic damages recovered in lawsuits, In re Norcia, 255 BR 394 (2000).

**5. DEBTOR AND HIS ATTORNEY ARE HEREBY GIVEN NOTICE THAT:**

**A. ANY OPPOSITION TO THE OBJECTION MUST BE FILED AND SERVED  
WITHIN THIRTY (30) DAYS AFTER THE OBJECTION WAS SERVED, AND**

**B. THE COURT MAY RULE UPON THE OBJECTION AND ANY RESPONSE  
THERE TO WITHOUT A HEARING.**

WHEREFORE, George W. Liebmann, Trustee prays that this Court enter an order sustaining the objection to the \$50,000 exemption in lawsuit proceeds.

/s/George W. Liebmann  
George W. Liebmann (Fed. Bar # 01112)  
LIEBMANN & SHIVELY, P.A.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9<sup>th</sup> day of November 2009, a copy of the foregoing Trustee's Objection to Debtor's Exemption in Lawsuit proceeds was either served via the Court's CM/ECF electronic notification system or mailed first class, postage prepaid to:

Jeffrey M. Sirody, Esq.  
Sirody, Freiman & Feldman  
1777 Reisterstown Road, 360E  
Baltimore, MD 21208

Office of the U.S. Trustee  
Garmatz Federal Courthouse  
101 West Lombard Street Room 2625  
Baltimore, MD 21201

David Bo Hyeon Lim  
13135 Hidden Acres Lane  
Bishopville, MD 21813

/s/George W. Liebmann  
George W. Liebmann